

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**Jeffrey Walter  
An individual,  
Plaintiff**

**v.**

**Ville de Paris (The City of Paris),  
A Municipal Commune of France,  
Defendant**

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**Civil Action No. 09-3939**

**PLAINTIFF'S STATUS REPORT**

Pursuant to the Court's June 21, 2011 Order [Document 18], Plaintiff Jeffrey Walter files this Status Report and states as follows:

**I. NATURE OF THE CASE**

1. This is a domain name case brought under the Anticybersquatting Consumer Protection Act (15 U.S.C. § 1125(d)("ACPA") and/or Lanham Act (15 U.S.C. § 1051, *et seq.*) against Defendant The City of Paris.

2. Plaintiff had to invoke the Hague Convention and service under the Foreign Sovereign Immunities Act. All of the necessary paperwork was presented to the Ministry of Justice in Paris, France on March 18, 2010. The Ministry of Justice is charged, under the appropriate rules, with formally serving the City of Paris.

3. Defendant was served on October 20, 2010. Attached hereto as Exhibit A is a true and correct copy of the Affidavit of Accurate Translation and Report showing proper service.

4. Through the FSIA and/or the Hague Convention, Defendant had as much as six months to Answer. Defendant has failed to do so. Defendant is therefore in default.

5. As demonstrated in Plaintiff's Original Complaint, when the City of Paris filed its Uniform Domain Name Resolution Dispute Policy ("UDRP") arbitration complaint, it consented to jurisdiction in this District. Specifically, the City of Paris admitted:

**VIII. Mutual Jurisdiction**  
(Rules, para. 3(b)(xiii))

[14.] In accordance with Paragraph 3(b)(xiii) of the Rules, the Complainant will submit, with respect to any challenges that may be made by the Respondent to a decision by the Administrative Panel to transfer the domain name that is the subject of this Complaint, to the jurisdiction of the courts at the location of the principal office of the concerned registrar.

The registrar for the subject domain is in this District.

6. Plaintiff will therefore file a Motion for Default seeking a default judgment against Defendant.

7. Should alternative service or notice be necessary or ordered by the court, Plaintiff is prepared to provide notice of the Motion to Default on the

attorneys who represented the City of Paris in the UDRP dispute. They were already provided notice of this suit.

Respectfully submitted on this 1<sup>st</sup> day of July, 2011:

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